

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Northern Division)**

**DAVID J. BOSHEA** \*

**Plaintiff,** \*

v. \*

**COMPASS MARKETING, INC.** \*

**Defendant.** \*

\* \* \* \* \*

**Case No. 1:21-CV-00309-ELH**

**UNOPPOSED MOTION TO EXTEND TIME TO FILE RESPONSE**

David Boshea files this Unopposed Motion to Extend Time to File Response, and in support states:

1. Compass Marketing, Inc. filed Defendant Compass Marketing, Inc.'s Motion for Reconsideration of Order Denying Renewed Motion for Judgment as a Matter of Law or, in the Alternative, Motion for Reconsideration of Order Granting a New Trial on All Claims on September 5, 2024.
2. Under the Local Rules, David Boshea's response to the motion is due on September 19, 2024.
3. Due to David Boshea's counsel's health issues, David Boshea requests an additional seven (7) days to respond to the motion.
4. There exists good cause to extend the response deadline.
5. As required by Local Rule 105.9, David Boshea's counsel conferred with Compass Marketing, Inc.'s counsel before filing this motion, and Compass Marketing, Inc.'s counsel consented to an extension of the response deadline.

WHEREFORE, for the reasons set forth above David Boshea requests that this Court extend the deadline for responding to Defendant Compass Marketing, Inc.'s Motion for Reconsideration of Order Denying Renewed Motion for Judgment as a Matter of Law or, in the Alternative, Motion for Reconsideration of Order Granting a New Trial on All Claims to September 26, 2024.

Dated: September 19, 2024

Respectfully submitted,

/s/ Gregory J. Jordan

Gregory J. Jordan (Admitted Pro Hac Vice)  
Jordan & Zito LLC  
350 N. LaSalle Street, Suite 1100  
Chicago IL 60654  
(312) 854-7181  
[gjordan@jz-llc.com](mailto:gjordan@jz-llc.com)

Thomas J. Gagliardo (Bar No. 08499)  
Of Counsel  
Gilbert Employment Law, P.C.  
1100 Wayne Ave, Suite 900  
Silver Spring, Maryland 20910  
[tgagliardo@gelawyer.com](mailto:tgagliardo@gelawyer.com)

COUNSEL FOR DAVID J. BOSHEA

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on September 19, 2024, the foregoing Motion to Extend Discovery Deadline was served via the CM/ECF system on the following counsel of record:

Stephen B. Stern, Bar No.: 25335  
Shannon Hayden  
Kagan Stern Marinello & Beard, LLC  
238 West Street  
Annapolis, Maryland 21401  
[stern@kaganstern.com](mailto:stern@kaganstern.com)  
[yeung@kaganstern.com](mailto:yeung@kaganstern.com)

*Counsel for Defendant*  
*Compass Marketing, Inc.*

/s/ Gregory J. Jordan

Gregory J. Jordan